

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

JANE DOE, a minor, by and through her
mother and next friend, MOTHER DOE,

CASE NO.: 1:23-cv-23004-JB

Plaintiff,

v.

ACADEMIR CHARTER SCHOOLS, INC.,
and SUPERIOR CHARTER SCHOOL
SERVICES, INC.,

Defendants.

**PLAINTIFF'S EMERGENCY MOTION TO SEAL DEFENDANT'S MOTION AND
EXHIBITS [ECF NO. 51] FOR FAILURE TO PROTECT MINOR CHILD'S
CONFIDENTIAL INFORMATION**

Plaintiff, JANE DOE ("Plaintiff" and/or "Jane"), by and through her undersigned counsel, respectfully submits this Emergency Motion to Seal Defendant's Motion And Exhibits [ECF No. 51] For Failure To Protect Minor Child's Confidential Information, and states as follows:

1. On September 11, 2024, Defendant Superior Charter School Services, Inc. filed a motion and exhibits under ECF No. 51, which contained the full name of Jane Doe, a minor child. This disclosure violated both the Court's Protective Order, entered on December 14, 2023 [ECF No. 24], and the CM/ECF procedures that require the redaction of personally identifiable information concerning minors.

2. Defendant Superior's disclosure threatens the privacy and safety of Jane Doe and undermines the protections provided by the Court. The severity of this breach necessitates immediate judicial intervention to seal Document No. 51 and its associated exhibits to prevent further unauthorized dissemination of Jane Doe's identity.

WHEREFORE, Plaintiff respectfully moves this Honorable Court to issue an Order sealing Defendant's Motion and exhibits [Document No. 51] to prevent further dissemination of Jane Doe's identity and any other relief the Court deems appropriate.

CERTIFICATION OF EMERGENCY

After reviewing the facts and researching applicable legal principles, I certify that this motion in fact presents a true emergency (as opposed to a matter that may need only expedited treatment) and requires an immediate ruling because the Court would not be able to provide meaningful relief to a critical, non-routine issue after the expiration of seven days. I understand that an unwarranted certification may lead to sanctions.

Dated: Miami, Florida
September 11, 2024,

DEREK SMITH LAW GROUP, PLLC
Counsel for Plaintiff

/s/ Kyle T. MacDonald
Kyle T. MacDonald, Esq.
Florida Bar No.: 1038749
Derek Smith Law Group, PLLC
520 Brickell Key Drive, Suite O-301
Miami, FL 33131
Tel: (305) 946-1884
Fax: (305) 503-6741
Kyle@dereksmithlaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document is being served on September 11, 2024, on all counsel of record identified on the service list below via transmission of Notices of Electronic Filing generated by CM/ECF.

By: /s/ Kyle T. MacDonald
Kyle T. MacDonald, Esq.

SERVICE LIST

KELLY KRONENBERG

Julie B. Karron, Esq.
Florida Bar No.: 1025196
KELLY KRONENBERG
10360 West State Road 84
Fort Lauderdale, Florida 33324
Phone: 954-370-9970
Fax: 954-382-1988
Email: jkarron@kellykronenberg.com

Counsel for Defendant Academir Charter Schools, Inc.

GARRISON, YOUNT, FORTE & MULCAHY, LLC

Scott P. Yount, Esq.
Florida Bar No.: 0021352
GARRISON, YOUNT, FORTE & MULCAHY, LLC
601 Bayshore Blvd., Suite 800
Tampa, Florida 33606
Phone: 813-275-0404
Fax: 813-275-0304

Counsel for Defendant Superior Charter School Services, Inc.